

Comments on Docket 12-268

Comments of expanding the Economic and Innovation Opportunities of Spectrum  
Thru Incentive Auctions.

January 22, 2013

We are Class A and LPTV stations

KULX-CA is an affiliate of NBC Telemundo and serves the Hispanic Population of the Metro Salt Lake DMA, 17.5% of the population of Salt Lake and 16.9% of the population of Weber counties. We serve a substantial audience with programming in Spanish. KUTA-LD serves approximately 110,000 in the Cache Valley Utah and Idaho in English and Spanish. Approximately 18% of total TV viewing is over the air in the market, and the share of over-the-air viewing is higher in Hispanic.

I am a broadcast pioneer, a student assistant in 1955 & 56 at KUON-TV working on the study to prove television could be used as a teaching tool, and how people react to television. I have worked in Television and related media for 58 years and am the president and owner of the Airwaves, inc.

Respectively,

Airwaves, Inc

Television

III Repacking A Coverage Area Comments on Docket 12-268 Page two

P 99 Class A Stations Protected Contour

The Commission should use the same 50-90 contour for Class A stations  
because:

Our viewers cannot distinguish between full power and class A now. Viewers  
need to be protected.

Class A stations provide more unique local programming.

Class A stations are not always on other distribution systems because they are  
not a must carry station. We are not on Dish or Direct TV, yet we are highly rated in the  
market.

We are an affiliate of NBC Telemundo Network and provide specific service to the  
Hispanic community, which represents 17.5% of Salt Lake County, and 16.9% of Weber  
County and find our Hispanic community uses more antennas than may be expected.

Class A stations have a weaker signal, and the interference from a more powerful  
station disrupts the viewer's reception easily, especially in mountain areas where  
broadcast signals can "bounce" and provide unexpected interference in one site, and  
lesser signal in others.

Increased service area protection protects the second sets in homes, and those  
viewers who use an outdoor antenna with a distribution system within their home who  
live near the class A protected contour. A digital signal is an acceptable signal until the

interference is greater than the set will allow, and this point may be many miles beyond the protected contour, depending on the antenna used. This minority audience should still be served.

Viewers are voters, and they should not loose service for choosing specialized local broadcast services not attainable elsewhere, in metro or rural areas.

Paragraph 100 Comments on Docket 12-268

Repacking

VIEWERS, should have 100 percent of the service from a station that they now have. Not all viewers pay for TV. In Utah about 18.5% of all viewing is over the air, and a higher percentage in Hispanic viewing. STATIONS SERVE VIEWERS. VIEWERS should expect exactly the same service they now have, and not be forced to pay. Viewers are citizens who expect their government to be for all, not just who can pay.

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reserve bands exclusively for broadcast use.

1. The public is entitled to free over the air broadcast services providing
  - a. Local news and pubic service
  - b. Local Advertising to promote and sustain the local economy
  - c. Emergency Services, broadcast television works when other distributed services do not.
2. Broadcast is a regulated service providing programming and communication to a majority of citizens at a specific place. Even though broadcast programming may also be viewed on a secondary distribution system, it is still provided to the public free of charge, and supported by advertisers or by the broadcaster. No system has been established to pay for the entire production of local programs. The public has a right to see these programs free.
3. Will the Commission expect broadband providers to provide broadcast services free?
4. The local impact of not having a specific place to see the service of a broadcast station reduces the public's ability to communicate, the advertiser's ability to create new demand for new projects, education to provide new knowledge, and reduces jobs at stations.
5. Internet Broadband is by it's nature unregulated. This is a limited communications device, it does not replace the regulated broadcast station which is responsible for what it says and does. The internet need not be accurate, true, or responsible. It does not provide information in the best interest of our nation, or the individual user, who must always be a "buyer beware."
6. Viewers need to have specific places to go, and they need to be free, open to all. As a student at U of Nebraska in 1955 and 56, I worked at KUON on the study to prove that television could teach. We discovered that the ability to see, hear and

understand reached even to small children learning languages, to improve education to all viewers whether they could pay for it or not, there's more to broadcast than meets the eye. It is a combination.

7. America has grown up with Television, and to remove the broadcast stations would change every person's life, and diminish the importance of being an American Citizen, because, on the internet you are part of the world, with viewpoints not always in our national interest. No matter how you see TV, we are still the local stations in our communities worried about our neighbors.

8. To get rid of Television Broadcasting Stations entirely should be up to a public vote.

9. All of the High and Low VHF spectrum and at least 20 UHF channels should be reserved for Broadcasting.

10. AM radio continues to serve although other services have arrived.

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This is by international treaty, which should be honored. Hospitals use this frequency and to pay to replace all of their equipment would be self-defeating as a revenue tool.

Comments on Section C Licensing and Operating rules Docket 12-268

A. Multiple ownership rules

The commission should insure that each qualified local broadcaster has a minimum of one broadcast signal.

B Displacement of LPTV and Translator Stations Docket 12-268

Paragraph 359

Utah's mountainous terrain requires that each station should have translators, boosters, and secondary service to reach to the viewers. Local governments and broadcasters have invested in both LPTV and Translators and they should have an opportunity to provide local service. Some of these areas in Utah are communities of over 75,000 people.

1. The Commission should authorize voluntary channel sharing.

2. The Commission should insure that each full power and class A station holding a LPTV or translator license in an area now served, should have at least one license surviving.

Paragraph 361 selection of priorities

1. We are a licensee of KUTA-LD a low power station with network affiliations in Logan, Utah. The Cache valley served has a population of over 100,000. Each market of this size should have a LPTV with network affiliation and locally produced news and programming.

Paragraph 371 Docket 12-268

Class A Full Power Sharing Agreements

A class A station sharing with a Full Power station should have the same rights

and requirements as the Full Power. By offering Class A more coverage with mustcarry rights more Class A stations will be interested in giving up their channel allocation.

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The Commission should not expect low cost or rapid implementation of these proposals.

We moved KULX-LD from channel 10 to channel 14 two years ago. I discovered that:

- 1.some the manufacture of broadcast equipment has moved out of the country,
- 2.that some parts are no longer available,
- 3.that lack of business has made each surviving company smaller, and that the equipment is much more expensive, and it takes longer for delivery.
4. The public will need to be educated to the change at a cost double that of the digital transition.
5. In Utah much of the 700 mhz spectrum appears to not be used.
6. You may have more success with a smaller spectrum proposal
7. The need for broadcast broadband will not be the same in smaller communities
8. No one has shown how broadcast broadband will provide free service to minorities, and lower income viewers.
9. We still need a dependable existing means of National TV Telecommunications based on the needs of our country that can reach everyone, especially in emergencies that is regulated, and is based on traditional responsible broadcasting.

Thank you for your consideration

Airwaves, Inc

Television

KULX-51 Ogden KULX-LD 10 Ogden â?¢ KUTA-8 Logan â?¢ KULU-16 Park City \* KQTI-17 â?¢  
Ogden

453 Simoron Drive, Ogden, Utah 84404 Phone 801 393-0012 Fax 801-393-1105